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KENTON COUNTY  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

:

Case No. CR-1-02-054

Plaintiff,

4875

(Judge Weber)

v.

:

**MOTION TO TRANSFER**  
**DEFENDANT TYREESE PUGH**  
**TO KENTON COUNTY JAIL**

TYREESE DORRAN PUGH,

14

Defendant.

Now comes Defendant, Tyreese D. Pugh, by and through undersigned counsel, and hereby requests that the Defendant be transferred from his present location at the Boone County Jail in Burlington, Kentucky to the Kenton County Jail in Covington, Kentucky for the reasons set forth below.

Respectfully submitted,



Edward J. Felson (0041988)  
Attorney for Defendant  
36 East Seventh Street, Suite 1650  
Cincinnati, Ohio 45202  
(513) 721-2500

**MEMORANDUM**


Undersigned counsel was appointed to represent Tyreese Pugh on or about June 14, 2002. The undersigned visited Pugh at the Hamilton County Justice Center on June 19, 2002 with co-counsel Robert Andrews, who represents the Co-Defendant and father, Walter Pugh, Jr.

Apparently an order to separate the Defendants, without notice to the undersigned counsel. The government unilaterally transferred Tyreese D. Pugh to the Boone County

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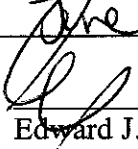
Jail in Burlington, Kentucky, approximately a forty-five minute drive from downtown Cincinnati where the undersigned keeps office. Therefore, instead of a seven-minute walk to the Hamilton County Justice Center, the undersigned must now travel approximately one hour each way depending on traffic. The undersigned submits that his ability to represent the Defendant is compromised by the addition of ninety minutes of travel time necessary to merely speak to the Defendant. Needless to say, the undersigned submits that if separating the Defendants was the goal, it could be effectively accomplished by sending one of the Defendants to the Queensgate facility, which is part of the Hamilton County Justice Center system. Another less restrictive alternative would be secure residence at the Kenton County Jail. For these reasons, the Defendant should be transferred back to Hamilton County, in a different building, or in the alternative, to Kenton County, Kentucky.

Respectfully submitted,

  
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Edward J. Felson (0041988)  
Attorney for Defendant  
36 East Seventh Street, Suite 1650  
Cincinnati, Ohio 45202  
(513) 721-2500

#### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Wendy Cross, Assistant U.S. Attorney, 221 East Fourth Street, Suite 400, Cincinnati, Ohio 45202, and Attorney J. Robert Andrews, 2662 Madison Road, Cincinnati, Ohio 45208, by ordinary U.S. mail or hand delivery this 26 day of June, 2002.

  
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Edward J. Felson (0041988)